

STATE OF SOUTH CAROLINA

(Caption of Case)

In the Matter of:

Application of HTC Communications, LLC
For Designation as an Eligible Telecommunications
Carrier Pursuant to Section 241(e)(2) of the
Communications Act of 1934

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2007 - 402 - C

(Please type or print)

Submitted by: Jeremy C. Hodges

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input checked="" type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

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November 7, 2007

Via Electronic Filing & U.S. Mail

Charles L. A. Terreni
SC Public Service Commission
Post Office Drawer 11649
Columbia, SC 29211

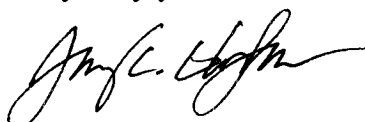
RE: HTC Communications, LLC
Application for ETC Designation
Our File: 19194/09015

Dear Mr. Terrini:

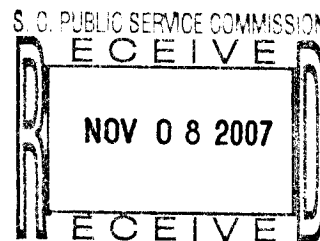
On behalf of HTC Communications, LLC, I hereby submit the enclosed Petition for Designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended, along with exhibits thereto.

Please acknowledge your receipt of this document by file stamping the enclosed copy of ✓ this letter and returning it in the envelope provided.

Very truly yours,


Jeremy C. Hodges

JCH:jch
Enclosure



THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO.

In the Matter of)	
)	
Application of HTC)	
Communications, LLC)	
For Designation as an Eligible)	
Telecommunications Carrier Pursuant)	APPLICATION
to Section 241(e)(2) of the)	
Communications Act of 1934)	

Pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"), HTC Communications, LLC ("HTCC") hereby petitions the South Carolina Public Service Commission ("Commission") for designation as an Eligible Telecommunications Carrier ("ETC") throughout its entire FCC licensed service area. That service area includes the entire rural study area of local exchange company, Horry Telephone Cooperative, Inc., and non-rural areas of the local exchange company, Verizon South, Inc., located in Horry County. As shown below, HTCC meets all statutory and regulatory prerequisites for ETC designation and HTCC's designation will serve the public interest.

I. BACKGROUND

HTCC is a South Carolina corporation that is currently licensed by the Federal Communications Commission ("FCC") to provide cellular Commercial Mobile Radio Service ("CMRS"). HTCC's ultimate owner, Horry Telephone Cooperative, Inc. ("Horry Telephone") is a cooperative that has provided quality telecommunications services to customers in parts of the coastal northeast area of the State of South Carolina for many years. As part of the Horry Telephone affiliated companies' continued commitment to quality service,

HTCC obtained a license from the FCC to provide wireless service to customers in this geographic area that granted them the rights to provide wireless service throughout Horry and portions of Georgetown Counties.

HTCC provides all of the services and functionalities supported by the federal universal service program that are set forth at 47 C.F.R. § 54.101(a)(1)-(9) in the areas it is licensed to provide service. HTCC certifies that if designated as an ETC, it will use high-cost support to: assist with expansion of its coverage areas to include currently unserved or underserved areas; to increase the quality of service it is able to offer to customers; to increase the reliability of its network and the speed and delivery of advanced wireless services to the public. Additionally, high-cost support will enable HTCC to provide lifeline and link-up discounted wireless service to qualifying low income customers who reside within HTCC's service areas that cannot otherwise afford wireless service.

II. REQUIREMENTS FOR DESIGNATION AS AN ETC

The FCC's March 17, 2005, ETC Criteria Order set forth certain criteria for ETC applications to the FCC. Similar requirements have been proposed and or adopted by the Commission. Combined, these regulations provide that an ETC applicant must demonstrate:

- 1) a commitment to provide service throughout its proposed designated service area to all customers making a reasonable request for service;
- 2) the ability to remain functional in emergency situations;
- 3) that it will satisfy applicable consumer protection and service quality standards;
- 4) that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation;

5) that it acknowledges the FCC may require it to provide equal access to long distance carriers in the event that no other eligible carrier is providing equal access within the service area;

6) that it does or will offer the services that are supported by the universal service support mechanisms;

7) that it does or will advertise in a media of general distribution the availability of such services; and

8) that designating the applicant as an ETC is in the public interest.

A. Commitment and Ability to Provide Supported Services

The Commission's proposed R.103-690(a) and 47 C.F.R. § 54.202(a)(1) require an ETC applicant to demonstrate its commitment to provide supported services throughout its designated service areas by: 1) committing to provide service on a timely basis to customers making a reasonable request for service; and 2) submitting a detailed plan demonstrating how high cost universal service support will be used by the applicant to improve its coverage, service quality, and capacity throughout the area for which it seeks ETC designation.

1. Commitment to Provide Service on a Timely Basis to All Customers Making a Reasonable Request

HTCC certifies that it will provide service on a timely basis to all customers within HTCC's service area making a reasonable request for service, where HTCC's network already provides coverage of the potential customer's premises. In responses to requests by these potential customers, HTCC will provide service immediately upon request.

If a potential customer is within HTCC's licensed area, but outside of its existing network coverage, HTCC commits that it will follow the six step process in 7 C.F.R. § 54.202(a)(1)(a) and the Commission's proposed R.103-690(a)(1)(A)(2) and determine if service can be provided at a reasonable cost by following those steps. In the event that HTCC

cannot provide service to the requesting customer after following those steps, it will provide notice to the requesting party and make any reports required by the Commission consistent with 47 C.F.R. § 54.209(a)(3).

B. Service Improvement Plan

In accordance with the Commission's Proposed R.103-690, and under its currently adopted criteria, HTCC submits that it has developed a two-year plan that describes with specificity proposed improvements and upgrades to HTCC's network on a cell site by cell site basis throughout its requested designated ETC service area.¹ HTCC also commits to providing an annual progress report consistent with 47 C.F.R. § 209(a)(1) that demonstrates planned uses for universal service monies.

HTCC's confidential two-year plan includes a projected start date and completion date for each project and the estimated amount of investment required for each of the planned projects that HTCC would implement with the assistance of universal support. The two-year plan also contains specific geographic areas where improvements will be made and good faith estimates of universal service benefits, including improved signal coverage and quality, that customers, residents and the public at large will benefit from.

C. Ability to Remain Functional in Emergency Situations

HTCC is committed to remaining functional in emergency situations and its network is designed to do so. HTCC's network has battery backup or permanent generators at all of its cell sites to ensure functionality without an external power source. HTCC can also deploy cellular on wheels or "COWs" that can be driven to cell sites or locations affected by emergency conditions to assist with managing traffic spikes caused by such conditions. HTCC

¹ HTCC's two year plan contains sensitive, competitive information. HTCC is therefore also filing a Motion for Protective Order with the Commission to ensure that its plan is treated as confidential and proprietary.

also utilizes AT&T's switches, which are equipped with emergency generators and have the capability of re-routing traffic in response to emergency conditions. Similarly, HTCC monitors its sites with sophisticated equipment capable of detecting disruptions caused by emergency situations that allow HTCC to respond quickly and accordingly.

HTCC will comply with any annual reporting requirements established by the FCC and the Commission and will provide both with detailed reports on any outages that may occur in accordance with existing FCC regulations found at 47 C.F.R. § 54.209(a)(2).

D. Consumer Protection and Service Quality Standards

The FCC provides that an ETC applicant must "demonstrate that it will satisfy applicable consumer protection and service quality standards." 47 C.F.R. § 54.202(a)(3). The Commission's proposed R.103-690 provides that an ETC applicant may satisfy this requirement by committing to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Code") and that other commitments will be considered on a case by case basis.

HTCC is currently committed to compliance with the CTIA Code for its entire network and operations and will continue to abide by the CITA Code if designated as an ETC. HTCC further certifies that if designated as an ETC, it will comply with 47 C.F.R. § 54.209(a)(4) & (a)(5), and any similar requirement adopted by the Commission to annually certify HTCC's compliance with the CTIA Code and report the number of customer complaints per thousand handsets on a yearly basis.

E. Local Usage

Current FCC regulations and the Commission's proposed R.103-690(a)(4) require an ETC applicant to demonstrate that it offers a local usage plan that is comparable to those

offered by the incumbent local exchange carriers in HTCC's service area. HTCC's current calling plans provide varying amounts of usage, some of which make no distinction between local and toll usage. These current rate plans provide customers with value comparable to those plans offered by the incumbent local exchange carriers in the areas that HTCC seeks ETC designation.

F. Equal Access to Long Distance Carriers

HTCC certifies that, consistent with 47 C.F.R. § 54.202 and the Commission's Proposed Regulation 103-690(a)(5), it will provide equal access to long distance carriers in the event that no other ETC is providing equal access within its service area. In support of this certification, HTCC has also submitted the affidavit of its CEO, Curley P. Huggins, which is attached hereto as Exhibit A.

G. HTCC's Supported Services

The FCC's Section 214(e) Public Notice requires that a carrier seeking ETC designation certify that it offers services supported by the federal universal service support mechanisms using either its own facilities or a combination of its own facilities and the resale of services of another carrier. *FCC's Section 214(e) Public Notice*, 12 FCC Rcd 22947, 22948 (Dec. 29, 1997). The Commission's proposed regulations echo this requirement and identify the following nine services and functionalities that are required of ETCs:

1. Voice grade access to a public switched network;
2. Local Usage;
3. Dual-tone, multi-frequency ("DTMF") signaling;
4. Single party service;
5. Access to emergency services;

6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and
9. Toll limitation for qualifying low income consumers.

See 47 C.F.R. § 54.101(a). Any carrier applying for ETC designation must certify that it provides each of the supported services or, where appropriate, a functionally equivalent service. In support of this certification, HTCC has also submitted the affidavit of its CEO, Curley P. Huggins, which is attached hereto as Exhibit A. As described in more detail below, HTCC currently provides, or will provide upon designation, each of the required services.

1. Voice grade access to a public switched network

HTCC currently provides its customers with “voice grade access” that enables a user to transmit and receive voice communications, including signaling associated with the transmission and receipt of telecommunications traffic. HTCC’s customers have the ability to place and receive voice grade calls to and from other HTCC customers and to and from all other users on the public switched telephone network. HTCC provides this voice grade access to its customers through interconnection of HTCC facilities and the public switched telephone network pursuant to interconnection agreements with local exchange and interexchange carriers.

2. Local Usage

FCC regulations require that an ETC applicant “demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.” 47 C.F.R. § 54.202(a)(1)(ii)(4); *See Federal-State Board on Universal Service*, CC Docket 96-45, Report and Order, 20 FCC Rcd 6371 (2005) (“*ETC Criteria*”).

Order"). The FCC defines local usage as a measure of minutes of use of exchange service provided for a fee and without an additional charge to end users. 47 C.F.R. § 54.101(2).

HTCC currently offers several calling plans and packages that make no distinction between local and long distance usage, as is customary with wireless service. HTCC believes that the calling plans it currently offers are comparable to those offered by the incumbent local exchanger carriers in the areas in which it seeks ETC designation, including its affiliate company, Horry Telephone.

In the event that HTCC's current calling plans are not deemed comparable to those offered by the incumbent local exchange carrier in its area, the receipt of universal support will allow HTCC to develop and offer to customers a new basic low-cost service plan that would be tailored to address the needs of customers who want a low-cost wireless service connection to the public switched network. The charge for this basic plan would be similar to the basic unlimited wireline local calling plans that are currently offered by Horry Telephone and would allow HTCC customers to call all Horry Telephone local service numbers without additional charges.

3. DTMF Signaling

DTMF is a method of signaling that facilitates the transportation of call set-up information and delivery of call detail information that makes touchtone dialing possible in wireline service. The FCC permits wireless carriers to provide methods of signaling that are functionally equivalent to DTMF to satisfy this service requirement. *See First Report and Order*, 12 FCC Rcd at 8810. HTCC currently utilizes out-of-band signaling and in-band multi-frequency signaling that is the functional equivalent of DTMF and therefore satisfies this requirement.

4. Single-Party Service

The FCC has determined that a wireless carrier offers the equivalent of single party service when it offers a dedicated message path for the length of a user's transmission. *First Report and Order*, 12 FCC Rcd at 8810. In contrast to early, basic wireline service, wireless service has always provided users with a dedicated path for their transmission. HTCC currently meets this requirement by providing a dedicated message path for the duration of a customer's transmission.

5. Access to Emergency Services

This requirement is satisfied by allowing customers of universal service providers to reach a public service answering point ("PSAP") by dialing "911" in order to reach emergency services. FCC regulations further require that a universal service provider must provide access to emergency services that have the capability of providing automated numbering information ("ANI") and automatic location information ("ALI") if the PSAP is capable of receiving and processing that information. 47 C.F.R. § 54.101(a)(5). HTCC satisfies this requirement by currently providing its customers with access to enhanced emergency services by dialing "911." HTCC, as an ETC, will be able to expand its coverage area to allow for greater access to emergency services for its customers in remote and currently un-served and underserved parts of its service area.

6. Access to Operator Services

This requirement has been defined as any form of automated or live assistance provided to a consumer for billing or completion of a call, or both. *First Report and Order*, 12 FCC Rcd at 8817-18. HTCC certifies that it meets this requirement by providing such a service to

its customers either through itself or other entities such as the incumbent local exchange carrier. HTCC customers may access live and automated operator services by dialing "0."

7. Access to Interexchange Services

HTCC has signed interconnection agreements with interexchange carriers. These arrangements allow HTCC to provide interexchange access to its customers. HTCC customers can send and receive calls to and from customers located anywhere on the public switched network.

8. Access to Directory Assistance

FCC regulations require that an ETC provide its customers access to directory assistance. *First Report and Order*, 12 FCC Rcd at 8821. HTCC's customers have the ability to call directory assistance by dialing "411," thereby satisfying this requirement.

9. Toll Limitation for Qualifying Low-Income Consumers

An ETC must provide Lifeline customers with toll limitation services to block the completion of outgoing calls beyond a local calling area that may incur additional charges. *First Report and Order*, 12 FCC Rcd at 8821-22. Because some of HTCC's current calling plans do not make a distinction between local and toll calls and since HTCC is not currently designated as an ETC, HTCC's customers have no current need for toll limitation services. If HTCC is designated as an ETC, HTCC will offer toll limitation services to address the needs of qualifying low-income customers interested in obtaining a basic wireless connection to the public telephone network. These services will also be provided to lifeline customers with appropriate limits on the customer's wireless service for calls beyond what the customer wants to pay for.

H. Advertisement of Supported Services

HTCC certifies that it will advertise the availability of the services that are supported by the federal universal support mechanisms, described above, and their applicable charges using media of general distribution within the service areas for which it is seeking to be designated as an ETC. HTCC will advertise these offerings in a manner that is designed: to fully inform potential customers of the services available to them; to disclose all associated rates; and to ensure qualifying low-income individuals are informed about the availability and cost of lifeline and link-up programs. In further support of this certification, HTCC has also submitted the affidavit of its CEO, Curley P. Huggins, which is attached hereto as Exhibit A.

III. **LICENSED AREAS IN THE STATE OF SOUTH CAROLINA**

The FCC currently requires ETC applicants to describe the geographic area in which it is seeking ETC designation. HTCC respectfully requests that it be designated as an ETC throughout its entire FCC licensed service area. That service area includes the entire rural study area of the local exchange carrier Horry Telephone covering much of Horry County and portions of Georgetown County. HTCC's licensed service area also includes the non-rural service areas of Verizon South, Inc. located in Horry County. These non-rural wire centers served by local exchange carrier Verizon South, Inc. are shown on the chart attached hereto as Exhibit B. HTCC serves Horry Telephone's rural study area and those non-rural Verizon South, Inc. wire centers in their entirety.

In this instance, no cream-skimming analysis is required because HTCC proposes to serve its entire FCC licensed service area and the FCC has concluded that a wireless carrier seeking ETC designation in all of the wire centers within its FCC licensed boundaries is not attempting to engage in creamskimming. FCC Memorandum and Order, CC Docket No. 96-

45, , at ¶32, Released January 22, 2004 (“Virginia Cellular Designation Order”). Further, HTCC is requesting designation for the entire rural study area of its affiliate local exchange company Horry Telephone along with other areas of the non-rural local exchange company, Verizon South, Inc. that fall within HTCC’s FCC license service area. The FCC has stated that “a creamskimming analysis is unnecessary for ETC applicants seeking designation below the service area level of non-rural incumbent LECs.” *ETC Criteria Order*, at 6394.

IV. PUBLIC INTEREST STANDARD

HTCC submits that the Commission should find that designation of HTCC as an ETC will serve the public interest. HTCC’s designation as an ETC will promote competition and provide real benefits to consumers in rural, high cost areas by increasing customer choice. Likewise, its designation will increase the availability of innovative services and expansion of new technologies that are otherwise only available to citizens residing in urban areas. Further, increased competition among both wireline and wireless carriers will create additional incentives for providers to increase their operating efficiency and to introduce and offer more choices, increased quality and value to their customers.


V. HIGH COST CERTIFICATION

HTCC certifies that it will use available high cost support for its intended purposes, including, the provision, maintenance and upgrading of facilities and services for which support is intended. HTCC respectfully requests that the Commission issue a finding that HTCC has satisfied the FCC’s high-cost requirement so that HTCC may be eligible to receive high-cost support upon designation as an ETC.

VI. CONCLUSION

HTCC respectfully requests that the Commission designate HTCC as an ETC throughout its FCC licensed boundaries. As set forth above, HTCC satisfies all of the requirements established by the FCC and this Commission as they pertain to ETC designation. HTCC is ready willing and able to meet the responsibilities inherent in ETC designation. As a result, HTCC asks that it be designated as such throughout its entire FCC licensed service area

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Columbia, South Carolina
November 6, 2007

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For Designation as an Eligible

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Telecommunications Carrier Pursuant

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to Section 241(e)(2) of the

)

Communications Act of 1934

)

**AFFIDAVIT OF CURLEY P.
HUGGINS**

I, Curley P. Huggins, after first being duly sworn, depose and say:

1. My name is Curley P. Huggins, and I am a citizen of the State of South Carolina. I am of sound mind and am over the age of twenty-one years.

2. I am competent to testify to the matters stated herein.

3. The matters stated herein are based on my personal knowledge.

4. I am the Chief Executive Officer , for HTC Communications, LLC ("HTCC"),

5. HTCC has filed an Application with the South Carolina Public Service Commission (the "Application") for designation as an Eligible Telecommunications Carrier ("ETC") throughout its entire FCC licensed service area in the State of South Carolina.

5. HTCC is a South Carolina corporation that is licensed by the Federal Communications Commission ("FCC") to provide Cellular Mobile Radio Service throughout certain areas of the State of South Carolina.

6. HTCC's licensed service area covers the entire rural study area of the local exchange carrier, Horry Telephone Cooperative, Inc. ("Horry Telephone"). HTCC is an affiliate of Horry Telephone, and I also serve as Chief Executive Officer of Horry Telephone.

7. HTCC's licensed service area also covers certain areas of Horry County that are served by the non-rural local exchange carrier, Verizon South, Inc.

8. As part of my duties as Chief Executive Officer of HTCC, I am familiar with HTCC's operations and have become familiar with the contents of HTCC's Application, mentioned above.

9. I am aware that current FCC regulations and those proposed by the South Carolina Public Service Commission ("SC PSC") require an ETC applicant to agree that it will provide equal access to long distance carriers in the event that no other ETC is providing equal access within its service area.

10. I hereby certify that if HTCC is granted ETC designation by the SC PSC, HTCC will provide equal access to long distance carriers in the event that no other ETC is providing equal access within HTCC's service area.

11. I also certify that HTCC currently offers all of the services that are supported by the federal universal service support mechanisms using HTCC's own facilities or a combination of its own facilities and resale of another carrier's services. Those services are set forth in more detail in Section G of the Application.

12. Further, I certify that HTCC does and will continue to advertise, in a media of general distribution, the availability of its services that are supported by the federal universal support mechanisms, and applicable charges for those services. HTCC's advertisement of these services is set forth in more detail in Section H of the application.

EXHIBIT B

**HTC Communications, LLC
State of South Carolina**

**Non-Rural Telephone Company Wire Centers
Where ETC Designation is Requested**

<u>LEC Name</u>	<u>WIRE CENTER</u>	<u>CLLI</u>	<u>County</u>
Verizon South, Inc.	Conway	CNWYSCXA	Horry
Verizon South, Inc.	Myrtle Beach	MYBHSCXB	Horry
Verizon South, Inc.	Myrtle Beach	MYBHSCXC	Horry
Verizon South, Inc.	Myrtle Beach	MYBHSCXM	Horry
Verizon South, Inc.	N. Myrtle Beach	ODBHSCXB	Horry
Verizon South, Inc.	N. Myrtle Beach	WNHLSCXA	Horry